SCANNED

UNITED STATES DISTRICT COURT
DISTRICT OF MAINE

UNITED STATES OF AMERICA	)	
	)	
v.	)	**Magistrate No.** 08-61-R
	)	
ELIZABETH YOUNG	)	

CRIMINAL COMPLAINT

I, Michael Dumond, being duly sworn, state that the following is true and correct to the best of my knowledge and belief:

COUNT ONE

On about March 24, 2008, in the District of Maine, defendant,

ELIZABETH YOUNG,

unlawfully, knowingly and intentionally possessed with intent to distribute 5 grams or more of a mixture or substance containing cocaine base, also known as crack cocaine, in violation of Title 21, United States Code, Section 841(a)(1).

It is further alleged that the penalty provisions of Title 21, United States Code, Section 841(b)(1)(B) apply to the conduct described herein.

This Complaint is based on those facts which are set forth in my affidavit dated June 3, 2008, which is attached hereto and incorporated herein by reference.

Michael Dumond
Task Force Agent
United States Drug Enforcement Administration

Sworn to before me, and subscribed in my presence this 3rd day of June, 2008

John H. Rich III
United States Magistrate Judge

AFFIDAVIT OF MICHAEL DUMOND

I, Michael Dumond, am a Task Force Agent with the United States Drug Enforcement Administration (DEA) and I swear that the facts set forth below are true. I make this Affidavit in support of the issuance of a criminal complaint charging Elizabeth Young with the offense of possession with intent to distribute five grams or more of cocaine base, also known as crack cocaine, in violation of Title 21, United States Code, Section 841(a)(1). Because this Affidavit is being submitted for a limited purpose, I have not included each and every fact that I know concerning this investigation. Rather, I have set forth only those facts that relate to the issue of whether probable cause exists to support the issuance of a criminal complaint. In addition, where I assert that a statement or observation was made, I did not personally hear the statement or make the observation unless specifically so stated. Instead, the information was provided by a witness or another law enforcement officer, either verbally or in writing, who had direct or indirect knowledge of the statement or observation.

1. I am a police officer in Lewiston, Maine, currently assigned as a DEA Task Force Agent (TFA) to the High Intensity Drug Trafficking Area (HIDTA) task force located in Portland, Maine. HIDTA's mission is to locate, identify, and dismantle drug smuggling/trafficking organizations. I have been a TFA since March 2007 and have been employed as a police officer for approximately seven years. During that time, I have participated in numerous investigations into the unlawful distribution of illegal drugs, in violation of Title 21 of the United States Code and the drug laws of the State of Maine. I have conducted or participated in, among other things, surveillance, undercover transactions, the execution of search and arrest warrants, debriefings of informants and confidential sources, and reviews of taped

conversations relating to narcotics trafficking.

2. On March 24, 2008, TFA Wayne Clifford received information from Central Maine Violent Crimes Task Force (CMVCTF) Agent David Levesque that Elizabeth Young of 40 Nichols Street in Lewiston, Maine had recently returned from Atlanta, Georgia with a substantial amount of crack cocaine, which she was now selling from her first floor apartment. CMVCTF Agent Levesque also advised TFA Clifford that he had information that Young was operating a late model rental car.

3. On March 24, 2008, CMVCTF Agent Levesque, TFAs Clifford and Josh Guay, and I established surveillance in the area of 40 Nichols Street. Agents observed a 2008 silver Dodge Avenger in the driveway of 40 Nichols Street. A registration check with the Maine DMV indicated that this vehicle was registered to Enterprise Rent-A-Car.

4. At approximately 4:00 p.m., the aforementioned agents approached Young's apartment. CMVCTF Agent Levesque and I knocked on the front door and made contact with Young. I recognized Young from a prior investigation. After we identified ourselves to Young, she invited us into her residence.

5. Young confirmed to us that she was on State of Maine bail conditions. I asked Young if she had anything in her apartment that should not be in it. Young then told me that she knew what the agents were after and that she did have "stuff" in the apartment.

6. Young then signed a DEA-88 Consent to Search form. Prior to agents beginning a search, Young retrieved a silver women's makeup bag from her bedroom closet and handed it to TFA Clifford. TFA Clifford opened the bag and located a large amount of U.S. Currency along with several substances. Based on his training and experience, TFA Clifford believed the

substances to be cocaine powder, cocaine base, and heroin. A chemical field test on the suspected cocaine powder and cocaine base was positive for the presence of cocaine. A chemical field test on the suspected heroin was positive for the presence of heroin. The gross weight of the suspected cocaine powder was approximately 46.40 grams including packaging. The gross weight of the suspected cocaine base was approximately 19.47 grams including packaging. The gross weight of the suspected heroin was approximately 9.87 grams including packaging.

7. Young acknowledged that she was distributing narcotics and that the majority of the money which was found with the suspected narcotics was proceeds from drug trafficking.

8. Based on the facts set forth above, I respectfully request that the Court issue a criminal complaint charging Elizabeth Young with the offense of possession with intent to distribute five grams or more of cocaine base, in violation of Title 21, United States Code, Section 841(a)(1).

Michael Dumond
Task Force Agent
United States Drug Enforcement Administration

Sworn to before me and subscribed in my presence this 3rd day of June 2008.

John H. Rich III
United States Magistrate Judge